

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ALLIANCE INDUSTRIAL SOLUTIONS, INC., <i>et al.</i>) CASE NO. 1:24-cv-00782-CAB
)
Plaintiffs,) JUDGE CHRISTOPHER A. BOYKO
)
vs.)
DAVID BISHOP, <i>et al.</i>) <u>MOTION OF PLAINTIFFS ALLIANCE</u>
) <u>INDUSTRIAL SOLUTIONS, LLC AND</u>
Defendants.) <u>ALLIANCE SOLUTIONS GROUP, LLC,</u>
) <u>DOING BUSINESS AS TALENTLAUNCH,</u>
) <u>FOR ENTRY OF PROTECTIVE ORDER</u>

Pursuant to L.R. 7.1 and Fed. R. Civ. P. 26(c), Plaintiffs Alliance Industrial Solutions, LLC and Alliance Solutions Group, LLC, doing business as TalentLaunch (collectively, “Alliance”), by and through the undersigned counsel, hereby respectfully move this Court to enter a Protective Order to protect from public disclosure the confidential and trade secret information of the parties, as well as certain non-parties, to this action. Discovery has commenced and the parties believe that some of the documents and information will contain trade secret or other confidential research, development, or commercial information. Alliance and Defendants Cornerstone Staffing Solutions, Inc., David Bishop, Michelle Hendrix and Aleisha Rambusch have agreed to the attached Protective Order. To date, Defendant Revman International, Inc. (“Revman”) has opposed entry of the Protective Order.

A party may move for a protective order to “require that ‘a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only a specified way.’” Fed. R. Civ. P. 26(c)(1)(G); *FTC v. Chemence, Inc.*, 209 F. Supp. 3d 981, 984 (N.D. Ohio 2016). If the trial court deems the trade secrets or other confidential information relevant and necessary, it may issue a protective order containing “the appropriate safeguards that should attend their disclosure” *Chemence*, 09 F. Supp. 3d at 984 (issuing protective order to

prevent disclosure of competitor's information to defendant). Here, Alliance seeks to protect its confidential and trade secret information related to the development, marketing, sales and operational strategies and procedures of its staffing services. Alliance alleges in its Complaint (ECF No. 1) that it has spent considerable time, money and effort to develop its confidential and trade secret information and safeguard it from public disclosure. (Complaint, ¶¶ 18-19). Alliance further claims that all of the Defendants—including Revman—conspired to misappropriate its confidential and trade secret information. (Complaint, ¶¶ 148-158). This confidential and trade secret information is relevant and necessary because it is so competitively sensitive that the receipt of the information by Defendants, including Revman, could result in competitive harm to Alliance. As such, this information is worthy of the appropriate safeguards provided by the proposed Protective Order, namely the ATTORNEYS' EYES ONLY designation.

The proposed Protective Order is also intended to protect all parties' confidential and trade secret information, as well as that of certain non-parties, from public disclosure and thereby facilitate the exchange of documents and information. The proposed Protective Order only includes items that the parties designate as confidential based upon a good-faith belief that those items come within Fed. R. Civ. P. 26(c)(1)(G). It also provides a reasonable mechanism for a party to challenge a confidentiality designation, including an ATTORNEYS' EYES ONLY designation, with the Court so long as the parties first meet and confer in a good faith effort to resolve the objection by agreement. As noted, Alliance and Defendants Cornerstone Staffing Solutions, Inc., David Bishop, Michelle Hendrix and Aleisha Rambusch have agreed to the attached Protective Order.

WHEREFORE, for good cause shown, Plaintiffs Alliance Industrial Solutions, LLC and Alliance Solutions Group, LLC respectfully move this Court to enter the attached Protective Order.

Respectfully submitted,

s/ Richard E. Hepp

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CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2024, a copy of the foregoing *Motion of Plaintiffs Alliance Industrial Solutions, LLC And Alliance Solutions Group, LLC, doing business as TalentLaunch, for Entry of Protective Order* was electronically filed with the Clerk of Court using the CM/ECF system. Notice of filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Richard E. Hepp
One of the Attorneys for Plaintiffs